

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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Jared Goyette, Craig Lassig, Michael Shum, Katie Nelson, Tannen Maury, Stephen Maturen, and The Communications Workers of America, *on behalf of themselves and other similarly situated individuals,*

Plaintiffs,

v.

City of Minneapolis; Minneapolis Chief of Police Medaria Arradondo *in his individual and official capacity*; Minneapolis Police Lieutenant Robert Kroll, *in his individual and official capacity*; Minnesota Department of Public Safety Commissioner John Harrington, *in his individual and official capacity*; Minnesota State Patrol Colonel Matthew Langer, *in his individual and official capacity*; and John Does 1-10, *in their individual and official capacities,*

Defendants.

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Court File No.:  
0:20-cv-01302 (WMW/DTS)

**DECLARATION OF JARED  
GOYETTE IN SUPPORT OF  
MOTION FOR TEMPORARY  
RESTRAINING ORDER**

I, Jared Goyette, declare under penalty of perjury, as follows:

1. I am a freelance journalist who works for national and international news publications. I submit this Declaration in Support of Plaintiffs' Motion for Temporary Restraining Order.

2. On Tuesday, April 13, 2021 I was standing by my car on North Humboldt Avenue in Brooklyn Center, Minnesota, a few minutes' walk from the protest occurring outside the Brooklyn Center Police Department building located at 6645 North Humboldt

Avenue, when at roughly 8:54 p.m. I was approached by a group of Minnesota State Troopers dressed in military camo and carrying long guns, walking southward down the street.

3. As they approached, a trooper by the front of the group said I had to either leave my car and walk north, or stay and not be able to go back toward the protests or anywhere else for a while.

4. I was there on assignment to cover the protest for *The Washington Post* and was wearing a bullet proof vest with a blue reflective “Press” sign on the front at chest level, and a yellow reflective jacket that has “Press” labels on the front and back. Additionally, I was carrying a bag over my shoulder that had another reflective “Press” badge fixed to the side facing the officers.

5. The troopers were moving quickly and hurried toward me. I told them I would stay, and although they did allow me to lock my vehicle from a few feet away, I didn’t have time to grab all my things.

6. The line of state troopers in combat attire were joined by others in riot gear as they approached the group of protesters by the police department. They began issuing a dispersal order meant for protesters over a bullhorn, and then followed it up with a message specifically aimed at journalists trying to document the events: “Media you need to disperse. Leave the area. Vacate to the north.” An officer also yelled, “Media, disperse.”

7. Officers fired concussion rounds, tear gas, and other projectiles as they approached and the crowd backed up. Protesters gathered in a group in the center of the road, with several in the front holding umbrellas.

8. I was standing off to the East side with a group of other journalists and photographers. I and the other journalists there were trying to stay out of the officers' way—avoiding the area between them and demonstrators—while maintaining a line of sight that would allow us to observe the actions of both parties.

9. A standoff developed near an apartment building that I and other reporters were trying to use as cover, angling ourselves so we could continue to look forward, but at a diagonal, north west direction. Again, this gave us a line of sight, while keeping us out of the area between officers and protesters.

10. Both the dispersal orders and the command for media to leave continued throughout. A cloud of riot gas blew in our direction, and I started to cough. Projectiles landed nearby. There were no protesters around this group of media members, many of whom (if not all) were clearly labeled as members of the press. Nonetheless, troopers fired less-lethal rounds in our direction.

11. Around this time, the troopers in combat gear had moved in a column around the apartment building to the west. As officers in the front fired concussion rounds, the group behind the building came sprinting out carrying batons. The group of reporters and myself were closest to them, all of us wearing reflective "press" labels. An officer screamed "Get the fuck out here," and we retreated, again staying to the eastern side of the street.

12. The bull rush of officers, combined with the long bangs of the concussion rounds, created a panicked, stampede of people. I stayed calm and walked north. I saw someone trip near me and grab their knee. A man in front of me yelled “medic” and I saw a woman on the ground.

13. I and the group of reporters continued to hang back, staying behind the front of the crowd, and moving into the parking lot to avoid being in the street. The crowd of protesters began to disperse and dissipate, heading to a new location. I could no longer reach my car and got a ride home from another reporter.

14. I intend to continue covering the protests, but I am fearful for my safety and the safety of my colleagues given the actions of the police and State Patrol last year and the fact that the State Patrol is again firing less-lethal rounds at journalists and threatening arrest.

***I declare under penalty of perjury that everything I have stated in this document is true and correct.***

Dated: April 14, 2021

/s/ Jared Goyette  
Jared Goyette